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FILED U.S. DISTRICT COURT DISTRICT OF MARYLAND

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V.

### IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

ALBALTIMORE DEPORTMINAL NO. CCB-18-0410

SHAREEF ROSHAN KARAM, a/k/a, ROLAND FERLANDO KELLS, a/k/a SAADIQ UMAN, \* (Bank Fraud, 18 U.S.C. §1344; Aggravated \* Identity Theft,

\* 18 U.S.C. §1028A(a)(1) &(c)(5); Aiding &

\* Abotting 18 U.S.C. §2)

\* Abetting, 18 U.S.C. §2)

Defendant.

\*\*\*\*

#### **INDICTMENT**

# (Bank Fraud)

The Grand Jury for the District of Maryland charges that:

At all times material to the Indictment:

- 1. Defendant, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, was a resident of Maryland and conducted business and financial transactions in the state of Maryland.
- 2. The following entities are financial institutions, the deposits of which are federally insured by the Federal Deposit Insurance Corporation (FDIC) or the National Credit Union Association (NCUA):
  - a. NYMEO, headquartered in Frederick, Maryland, is federally insured by the NCUA.
  - b. Suntrust Bank, headquartered in Atlanta, Georgia, is federally insured by the FDIC.
  - SECU, headquartered in Linthicum, Maryland, is federally insured by the NCUA.

#### Manner and Means of the Scheme and Artifice to Defraud

- 3. From on or about March 5, 2014 through in or around May, 2014, in the District of Maryland and elsewhere, defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, knowingly and willfully executed and attempted to execute a scheme and artifice to defraud financial institutions, and to obtain and attempt to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, through materially false and fraudulent pretenses, representations and promises, as set forth more specifically below.
- 4. It was part of the scheme and artifice to defraud that on or about March 5, 2014, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, submitted a false and fraudulent application for an automobile loan from NYMEO, including providing false information about his employment and income, in order to qualify for an automobile loan.
- 5. It was further part of the scheme and artifice to defraud that defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, claimed on the application to be purchasing an automobile.
- 6. It was further part of the scheme and artifice to defraud that defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, submitted counterfeit, false and fraudulent employment documentation to NYMEO when asked to provide proof of employment and income as part of the automobile loan application.

- 7. It was further part of the scheme and artifice to defraud that on or about March 31, 2014, defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, obtained a purchase order from Hyman Bros. Automobiles, a business operated in Virginia, reflecting an agreement for the defendant to purchase an automobile from the dealership.
- 8. It was further part of the scheme and artifice to defraud that on or about April 1, 2014, defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, obtained from NYMEO a cashier's check (check number 296187) in the amount of \$49,155.77 and made payable to "Hyman Bros. Automobiles and Shareef R. Karam" which was intended to be used to purchase an automobile.
- 9. It was further part of the scheme and artifice to defraud that on or about April 2, 2014, defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, registered the business "Hyman Bro Automobiles" with the State of Maryland.
- 10. It was further part of the scheme and artifice to defraud that on or about April 2, 2014, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/SAADIQ UMAN, opened a business checking account for "Hyman Bro Automobiles" at SunTrust Bank (account number ending 4860).
- 11. It was further part of the scheme and artifice to defraud that on or about April 3, 2014, defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, deposited the NYMEO cashier's check into the SunTrust business checking account in the name of "Hyman Bro Automobiles."

12. It was further part of the scheme and artifice to defraud that defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, then withdrew at least \$39,700 in cash or as debit charges from the SunTrust account (account number 4860) between April 7, 2014 and April 23, 2014, with the remainder spent by May, 2014, including but not limited to the following:

Date	Check No.	Amount	SunTrust Location	
April 7, 2014	98	\$9,000.00	Congressional Village Branch	
April 8, 2014	99	\$9,500.00	Baltimore Main Branch	
April 9, 2014	80	\$9,500.00	Bethesda Main Branch	
April 23, 2014	80	\$1,000.00	Anacostia Branch	

13. It was further part of the scheme and artifice to defraud that defendant SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, then used the funds for his own purposes, and not to purchase an automobile, thereby depriving the financial institution of collateral for the fraudulent loan.

#### The Charge

14. From on or about March 5, 2014 through on or about April 23, 2014, in the District of Maryland, the defendant,

### SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a SAADIQ UMAN,

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud financial institutions, and to obtain and attempt to obtain monies, funds and credits of financial institutions, and under the custody and control of financial institutions, by means of materially false and fraudulent pretenses, representations and promises; to wit, he submitted a false and

fraudulent automobile loan application using incorrect income and employment information and counterfeit documentation in order to obtain an automobile loan in the amount of \$49,155.77 from NYMEO, then converted the loan to his own purposes, thereby depriving NYMEO of it collateral for the loan (the automobile for which the financing was advanced).

18 U.S.C. §1344

# COUNT TWO (Bank Fraud)

The Grand Jury for the District of Maryland further charges that:

1. Paragraphs 1 and 2 of Count One are hereby incorporated by reference as though fully set forth herein.

### Manner and Means of the Scheme and Artifice to Defraud

- 2. It was part of the manner and means of the scheme and artifice to defraud that the defendant, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, obtained the personal and financial information of "EL," including checks payable from the SunTrust checking account number ending in 9760, belonging to "EL."
- 3. It was further part of the manner and means of the scheme and artifice to defraud that the defendant, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, used a SECU checking account opened in the name of "JP" (account number ending 7991) and a SECU savings account opened in the name of "JP" (account ending 7967) to deposit the stolen SunTrust checks drawn on the account of EL, including but not limited to the following:

Date	Check No.	Amount	Source Account	Deposit Account
April 7, 2014	1725	\$ 985.14	EL (SunTrust 9760)	JP (SECU 7967)
April 8, 2014	1727	\$ 968.00	EL (SunTrust 9760)	JP (SECU 7967)
April 8, 2014	1728	\$ 1,200.00	EL (SunTrust 9760)	JP (SECU 7991)
April 8, 2014	1729	\$ 882.21	EL (SunTrust 7960)	JP (SECU 7967)
April 10, 2014	1730	\$ 950.16	EL (SunTrust 9760)	JP (SECU 7991)
April 10, 2014	1731	\$ 890.23	EL (SunTrust 9760)	JP (SECU 7967)
April 10, 2014	1732	\$ 775.00	EL (SunTrust 9760)	JP (SECU 7991)
April 10, 2014	1733	\$ 920.00	EL (SunTrust 9760)	JP (SECU 7967)
April 14, 2014	1734	\$ 925.00	EL (SunTrust 9760)	JP (SECU 7991)
April 14, 2014	1735	\$ 875.00	EL (SunTrust 9760)	JP (SECU 7967)

4. It was further part of the manner and means of the scheme and artifice to defraud that the defendant, SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a/ SAADIQ UMAN, then withdrew the funds from the SECU accounts ending 7991 and 7967 to use for his own purposes.

### The Charge

5. From on or about April 7, 2014 through on or about April 18, 2014, in the District of Maryland, the defendant,

### SHAREEF ROSHAN KARAM, a/k/a ROLAND KELLS, a/k/a SAADIQ UMAN,

knowingly and willfully executed and attempted to execute a scheme and artifice to defraud a financial institution and to obtain any of the moneys, funds, credits, assets, and other property owned by and under the custody and control of a financial institution, by means of materially false and fraudulent pretenses, representations, and promises, to wit: the defendant deposited stolen checks drawn on the SunTrust checking account belonging to EL (ending 9760) into a SECU checking account (ending 7991) and a SECU savings account (ending 7967), both in the name of JP, and then withdrew the funds for his own use.

18 U.S.C. §1344

18 U.S.C. §2

# COUNT THREE (Aggravated Identity Theft)

The Grand Jury for the District of Maryland further charges that:

- 1. Paragraphs 1 and 2 of Count One and paragraphs 2 through 4 of Count Two of the Indictment are hereby incorporated by reference as though fully set forth herein.
- 2. From on or about April 7, 2014 through on or about April 18, 2014, in the District of Maryland, the defendant,

## SHAREEF ROSHAN KARAM, a/k/a ROLAND FERLANDO KELLS, a/k/a SAADIQ UMAN,

did, during and in relation to a felony violation enumerated in 18 U.S.C. §1028A(c), knowingly transfer, possess and use, without lawful authority, a means of identification of another person, knowing that the means of identification belonged to another person, to wit: the defendant used the name and financial account number of EL and the name and financial account numbers of JP, during and in relation to bank fraud under 18 U.S.C. §1344, as set forth in Count Two of the Indictment.

18 U.S.C. §§ 1028A(a)(1), (c)(5) 18 U.S.C. § 2

Robert K. Hur

United States Attorney

A TRUE BULK

SIGNATURE REDACTED

Date: